

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 25-10038-PMM
Roger M. Adams and Jennifer Rae Adams aka	:	Chapter 13
Jennifer Rae Barnett	:	
<i>Debtor</i>	:	
Newrez LLC dba Shellpoint Mortgage Servicing	:	
<i>Movant</i>	:	
vs.	:	
Roger M. Adams and Jennifer Rae Adams aka	:	
Jennifer Rae Barnett	:	
<i>Debtor/Respondent</i>	:	
and	:	
Kenneth E. West, Esquire	:	
<i>Trustee/Respondent</i>	:	

OBJECTION TO CONFIRMATION OF THE PLAN

Newrez LLC dba Shellpoint Mortgage Servicing (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Roger M. Adams and Jennifer Rae Adams aka Jennifer Rae Barnett (“Debtor”), as follows:

1. As of the bankruptcy filing date of January 06, 2025, Movant holds a secured Claim against the Debtor’s property located at 437 Iroquois Street, Lester, PA 19029.

2. Movant is in the process of filing a Proof of Claim by the 3/17/2025 bar date, with an estimated secured claim in the amount of \$109,394.69, and estimated pre-petition arrears in the amount of \$19,292.58.

3. The Plan currently proposes payment to Movant in the amount of \$15,500.00 for pre-petition arrears.

4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).

5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 01/31/2025

/s/Danielle Boyle-Ebersole
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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Debtor/Respondent :
and :
Kenneth E. West, Esquire :
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**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for Newrez LLC dba Shellpoint Mortgage Servicing (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 01/31/2025:

Brad J. Sadek, Esquire
Via Electronic Filing
Attorney for Debtor

Kenneth E. West, Esquire
Via Electronic Filing
Trustee

Roger M. Adams
Jennifer Rae Adams
437 Iroquois Street
Lester, PA 19029
Via First Class Mail
Debtor

Respectfully Submitted,

Date: 01/31/2025

/s/Danielle Boyle-Ebersole
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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